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## **DECLARATION 1**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of:

Application of BellSouth Corporation,  
BellSouth Telecommunications, Inc.,  
and BellSouth Long Distance, Inc.,  
for Provision of In-Region, InterLATA  
Services in South Carolina

CC Docket No. 97-208

**DECLARATION OF BETTY BAFFER  
ON BEHALF OF LCI INTERNATIONAL TELECOM CORP.**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
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In the Matter of:

Application of BellSouth Corporation,  
BellSouth Telecommunications, Inc.,  
and BellSouth Long Distance, Inc.,  
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Services in South Carolina

CC Docket No. 97-208

**DECLARATION OF BETTY BAFFER  
ON BEHALF OF LCI INTERNATIONAL TELECOM CORP.**

I, Betty Baffer, do hereby declare and state:

1. I am employed by LCI International Telecom Corp. ("LCI") as a Business Analyst for LCI's Local Services Division. In this job, I am the Local Services Division's liaison with BellSouth and I am responsible for working with BellSouth to resolve issues raised by LCI's local operations center and customer service group. I am LCI's designated point of contact with BellSouth for issues and problems concerning LCI's local exchange service business in BellSouth's region. I have worked in the telecommunications and related industries for six years.
2. LCI signed a resale agreement with BellSouth on February 6, 1997 covering all of the states in BellSouth's region. LCI placed its first resale order with BellSouth in early April 1997, and over the past six months, has gradually expanded its business into Georgia, Florida, Tennessee, North Carolina and Kentucky. Currently, LCI's customer base consists mostly of small businesses, typically with five to 20 lines, although LCI does have plans to provide local service to residential

customers in BellSouth's region beginning in 1998. LCI also has plans to expand its local services business into other sates in BellSouth's region, including South Carolina.

3. Since LCI began reselling service in BellSouth's region, BellSouth has failed to provide LCI with parity of access to the major functions of its operation support systems ("OSS"), including pre-ordering, ordering, provisioning, and billing. LCI's experiences in that regard in Georgia and other BellSouth states is relevant to South Carolina because BellSouth has adopted the same processes and procedures for access to its OSS across its entire region. Moreover, BellSouth has established region-wide service centers, one being located in Birmingham, Alabama, that provision orders from CLECs such as LCI, no matter in which state the order is generated.

4. Until recently, BellSouth did not have any type of electronic interface by which LCI could access the pre-ordering functions of BellSouth's OSS. LCI was forced to conduct its pre-ordering via facsimile and to retrieve customer service records ("CSR") manually. These manual processes have caused LCI serious delays. In Georgia, for example, the average interval between the time LCI requests a CSR and the time LCI receives the CSR is five days. On several occasions, BellSouth lost LCI's CSR request, sent incomplete CSRs, or sent the wrong CSR all together. CSRs are critical to LCI's sales efforts because they provide needed information about a BellSouth end-user's current services and features, enabling LCI to make a competitive offer. These delays and errors in providing CSRs delayed LCI's completion of sales and prevented LCI from competing on an equal footing with BellSouth.

5. The electronic interface known as "LENS" that BellSouth has recently made available to CLECs for pre-ordering functions also has serious limitations. One of its major deficiencies is that it is not integrated with any of the other

electronic interfaces BellSouth provides, including its EDI interface. Thus, the information that LCI enters into and obtains from LENS when conducting pre-ordering activities cannot be automatically imported into the EDI application for purposes of placing an order. LCI has to re-key that information to place even the simplest of orders, which I do not believe BellSouth representatives have to do when they conduct pre-ordering and ordering activities for their retail operations.

6. LCI recently began using BellSouth's EDI interface for ordering and provisioning functions, and has been having so many problems with the orders that have been placed over that interface that LCI has periodically returned to placing orders manually, via facsimile. LCI's experiences with manual ordering and provisioning have not been favorable either. LCI has experienced numerous instances of lost orders and excessive delays in the provisioning of LCI orders. In Georgia, for example, in the first several months of LCI's operations, the average interval for provisioning basic conversion "as is" orders was approximately 8 days. BellSouth also failed to provide firm order confirmations on up to 40% of LCI's orders, and has often failed to provide any completion notices on orders. BellSouth's provisioning delays and failures to provide order confirmations and completion notices preclude LCI from competing on equal footing with BellSouth, and from providing service to its resale customers that is equal to that which BellSouth can and does provide to its customers.

7. These problems and delays in provisioning have not been resolved by LCI's use of BellSouth's EDI interface for ordering and provisioning. The problems that LCI has experienced to date with orders placed over EDI are described in more detail in the declaration of Beth Rausch. These problems have been addressed with BellSouth representatives, most recently in a letter I wrote to BellSouth dated September 18, 1997, a true and correct copy of which is attached hereto as Exhibit A.

8. One of the problems identified in my letter is the number of LCI orders that are falling out to manual processing on BellSouth's end once those orders have been transmitted electronically over the EDI interface. In several telephone calls with BellSouth representatives, we have received conflicting information on the circumstances that cause an order to fall out for manual processing. We have requested, but not yet received, any written clarification from BellSouth on this issue. Based on our experience to date, we believe that a substantial percentage of LCI's EDI orders have fallen out to manual processing, which explains the delays we have been experiencing in the provisioning of orders.

9. Unless BellSouth's EDI interface provides electronic flow-through for a substantial percentage of LCI's orders, LCI will not have parity of access to BellSouth's OSS.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief. Executed this 20<sup>th</sup> day of October, 1997 at McLean, Virginia.

  
Betty Baffer





## **EXHIBIT A**



September 18, 1997

Ken Enman  
1 Chase Corp. Dr.  
Suite 350  
Birmingham, AL 35203

VIA FAX: 205-444-0833

Dear Ken:

Thank you for attending the EDI conference call meeting on September 10. I've sent minutes from the meeting under separate cover. I am writing you this letter to follow up on several EDI-related items, and insofar as these are matters of BellSouth policy, I am addressing them with you as a representative of our account management team.

Lack of flow-through for EDI orders

According to our discussion during the conference call, there are circumstances where LCI's EDI orders would "drop out" of BellSouth's electronic systems and would be worked manually by BellSouth representatives. For example, EDI orders requiring clarification (i.e. clarification notices) will drop out of BellSouth's electronic system; the notices will be generated manually; and they will be faxed to LCI by BellSouth representatives. It was also stated that if BellSouth has made an error on an order or if there are problems with BellSouth's systems, EDI orders would be processed manually.

LCI requests that BellSouth advise us in writing of all circumstances in which an EDI order would not have full electronic flow-through. This information was requested during our meeting, but despite much discussion among the BellSouth representatives at the meeting, it was not provided. This information is needed because, among other reasons, there appears to be disagreement among BellSouth representatives as to which types of orders require manual processing. For example, several BellSouth representatives said that any order with six or more lines would be worked manually, while other BellSouth representatives disagreed. Beth Rausch had been told by BellSouth in a previous discussion that any order with more than one line would be worked manually. We request that BellSouth settle this confusion, and provide LCI with a full description of all order types that will fall out to manual processing.

We disagree with the statement made by BellSouth during the meeting that LCI should not be concerned if orders are being worked manually since the process is transparent to LCI. Past experience has proven that manual processing of orders is unreliable and increases provisioning intervals. Moreover, LCI developed its EDI system with the understanding that BellSouth would offer us a seamless, timely, and fully-automated system. Under current operating procedures EDI offers us little advantage over manual processing because the clarification notice process will be handled exactly the same way in EDI environment as it is in the manual environment. LCI is also entitled to this information because it is directly relevant to the issue of parity of access to BellSouth's OSS. This was recently recognized by the FCC in its order rejecting Ameritech's Section 271 application. One of the reasons for that rejection was Ameritech's reliance on manual processing of orders.

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Finally, we request that BellSouth advise us in writing of any existing plans to achieve full electronic flow-through for any order types that currently fall out to manual processing, including current implementation schedules.

#### Jeopardy Notification Process is Insufficient

BellSouth's policy for jeopardy notification is unacceptable. Currently, BellSouth will notify LCI by a phone call if, for any reason, the service date for an LCI customer cannot be met. BellSouth can make this call at anytime up to, and including, the date that service is due.

Among other things, our customers plan office moves around the due dates provided to us by BellSouth. The current jeopardy notification practice does not give our customers sufficient time to make alternative arrangements for their businesses. This reflects unfavorably on LCI. In addition, a telephone call provides no evidence that a jeopardy notice was served. We need a more reliable record of the notification

We, therefore, request that jeopardy notices be required prior to the due date, and that jeopardy notices be sent to us via EDI.

#### Problems with TrustedLink

The software package, TrustedLink, was offered to LCI and other CLECs as a means to use EDI processing without having to devote a lot of time and resources into software development. Unfortunately, this has not been the case.

A considerable amount of LCI's time and resources have been spent in efforts to correct deficiencies in the TrustedLink program. Although some of the problems have now been corrected, LCI believes that this was due to efforts initiated by LCI, and that BellSouth did not adequately test this software prior to offering it to CLECs. What has happened in many cases is that LCI has come up with ways to work around software problems. These work arounds involve tedious processes and make it impossible to easily train new users on the software.

In addition, the LCI order entry personnel who attended BellSouth's Trusted Link training were not trained using live EDI transactions or real-world EDI scenarios. This inadequate training left them poorly prepared when they encountered general fault protections and data formatting problems in submitting live EDI orders, as these problems had not occurred in training.

#### BellSouth Representatives Are Not Trained in EDI Order Processing

Our initial attempts to submit orders via EDI have been fraught with problems due largely to what appears to be the inexperience of the BellSouth representatives handling the orders.

By way of illustration, Beth Rausch submitted a batch of EDI orders on August 27<sup>th</sup>. She did not receive 855s or 865s from BellSouth for seventeen of the orders that were submitted that day. On August 28<sup>th</sup> and 29<sup>th</sup> she made phone calls to BellSouth but could not find an authoritative source who could give her the status of the orders. She spoke to a BellSouth representative, who had been named as our single

point of contact for EDI matters. At that time, this person had not even been made aware that she was responsible for providing LCI with EDI support. On September 9<sup>th</sup>, Beth Rausch finally got answers from service representatives at the LCSC, and found out that the service representatives were misinformed with regard to EDI capabilities. LCSC representatives had assumed that the information they typed in the "comments" section on each order was visible to LCI through EDI. This is not the case. Due to this error, seventeen orders for LCI customers were delayed. Unfortunately, this delay is not an isolated occurrence. Today, a list of nineteen EDI orders for which we have received neither 855s or 865s is being sent to BellSouth for resolution.

We were told during the conference call that the BellSouth staff has now been trained in EDI order processing. We hope that these assurances hold true, as we cannot continue to have our orders delayed.

Very truly yours,

A handwritten signature in cursive script that reads "Betty Baffer".

Betty Baffer  
LCI International

Cc: Susan Lewis (BellSouth)  
Odin Moody (LCI)



## **DECLARATION 2**

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of:

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CC Docket No. 97-208

**DECLARATION OF ALBERT D. WITBRODT  
ON BEHALF OF LCI INTERNATIONAL TELECOM CORP.**



Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of:

Application of BellSouth Corporation,  
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CC Docket No. 97-208

**DECLARATION OF ALBERT D. WITBRODT  
ON BEHALF OF LCI INTERNATIONAL TELECOM CORP.**

I, Albert D. Witbrodt, do hereby declare and state:

1. I work for LCI International Telecom Corp. ("LCI") as a Project Manager – EDI Account Executive. In this position, I am responsible for implementing LCI's use of the electronic data interchange ("EDI") interface that BellSouth has made available to competitive carriers for access to BellSouth's operations support systems ("OSS"). I am LCI's principal point of contact with BellSouth for issues and problems that have arisen during LCI's efforts to implement BellSouth's EDI interface. I have a Bachelor of Science degree in Computer Science from Michigan State University. I have over 20 years experience in network computing and data processing, and before joining LCI, I had over three years of experience working with EDI interfaces.

2. LCI began its efforts to implement BellSouth's EDI interface in June of 1997, not long after LCI first began reselling local service in BellSouth's region. It is my understanding that BellSouth makes available the same

electronic interfaces for access to its OSS in every state in its region. The BellSouth EDI applications that LCI currently uses for ordering in several states in BellSouth's region, including Georgia, Florida and North Carolina, is an application called Trusted Link that was developed for BellSouth by a company called Harbinger Corporation.

3. Before BellSouth would permit LCI to begin using the EDI interface for placing orders, BellSouth required LCI to undergo a certification process that involved two steps. The first step was a "connectivity test," which was designed to test the capability of LCI to transmit documents to the value added network (VAN) belonging to Harbinger Corporation. The second step was a test of LCI's capability to generate and submit error-free documents to BellSouth using the EDI interface. I was responsible for overseeing both tests on LCI's behalf. The connectivity test was completed on July 2, 1997. The second phase of the certification process began on July 15, 1997, and was completed on September 25, 1997. LCI has now been authorized by BellSouth to use the EDI interface for all POTS orders.

4. At the beginning of the second phase of BellSouth's certification process, I attended a training session offered by BellSouth on its EDI application. This training session was held in Birmingham, Alabama, and was purportedly offered by BellSouth to train CLEC representatives in the operation of BellSouth's EDI application. This training session was wholly inadequate for that purpose. The Bell South representative who conducted the training had never submitted an actual order across BellSouth's EDI interface in a training session, and thus was not able to address the document or process flows that occur after an initial order has been submitted. Nor were we able at this training session to submit our own orders across BellSouth's EDI interface. The computers

BellSouth provided for our training were stand-alone systems; they were not even connected to BellSouth's OSS. Thus, the only training we received was on how to fill out a basic electronic order form, which in EDI parlance is known as an "850." The training session did not address other key EDI documents, including order acknowledgments (997s), order confirmations (855s), and completion notices (865s), nor did it address how to handle such occurrences as order corrections and order cancellations while an order was pending in BellSouth's systems.

5. There were numerous problems that occurred during the phase of the certification process in which LCI was submitting test orders. For example, although LCI followed the test data published in BellSouth's implementation guides, some orders were rejected by BellSouth. There were also test orders on which no order acknowledgements were received back from BellSouth, even though such acknowledgments are required by EDI standards. These (and other) problems were documented in a letter sent to BellSouth on August 7, 1997, a true and correct copy of which is attached hereto as Exhibit A. Many of these same problems have plagued LCI in its use of the EDI interface for live production orders, and are addressed in a separate affidavit filed by Beth Rausch of LCI.

6. The inadequacy of BellSouth's training for CLECS such as LCI on the BellSouth EDI has been compounded by the fact that BellSouth does not appear to have sufficient personnel who have been fully trained in EDI to respond to problems that inevitably occur in the implementation of EDI. BellSouth has thus far failed to provide LCI with a single point of contact to whom we can address the problems and issues that have arisen in use of the EDI application for live orders. We frequently have to make numerous telephone

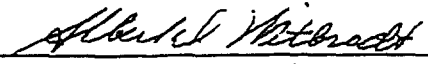
calls to several different BellSouth representatives in an effort to resolve problems and obtain answers to questions that we have. This is a process that can and does take days to accomplish. Moreover, most of the BellSouth representatives to whom we are referred are unable to provide answers or solutions to the problems and issues we have raised, and readily admit that they are unfamiliar with the workings of BellSouth's EDI processes.

7. The problems that have arisen in live production have included system outages that interfered with the timely exchange of electronic responses; excessive service order response times in BellSouth's Resale Service Center (known as the "LCSC"); lost/misplaced documents in the LCSC; and the inability to locate a knowledgeable person in the LCSC to assist in EDI problem resolution. Due to the inability of LCI to determine the status of document exchanges, service orders and to perform problem determination in a live production environment, BellSouth and LCI held a telephone conference call to identify problem determination procedures. There were no established BellSouth procedures. LCI's objective of the conference call was to establish a schedule so that the parties could determine if a transmission error or transmission delay had occurred in the EDI document exchanges between BellSouth and LCI. That objective was accomplished with BellSouth committing to established time intervals for document exchanges. For example, BellSouth committed in that conference call to provide firm order confirmations (855s) within 24 hours after submission of LCI's orders. To date, BellSouth has met that commitment on only a small portion of LCI's orders. For most of the orders, BellSouth has not been providing firm order confirmation until five days after submission of the orders.

8. Another problem that BellSouth has not yet resolved is a deficiency in its EDI interface with respect to order cancellations. The industry standards for EDI require that an order change acknowledgment, an 865, be sent by BellSouth following receipt of a cancellation of a pending order. BellSouth's EDI does not issue such acknowledgments, and a CLEC would not, therefore, know whether the order cancellation has been processed by BellSouth. I advised BellSouth representatives of this deficiency by e-mail dated August 15, 1997, a true and correct copy of which is attached as Exhibit B. BellSouth has not yet resolved this deficiency.

9. CLECs such as LCI do not have equal access to BellSouth's OSS just because BellSouth has an EDI interface over which orders can be submitted. BellSouth must provide an EDI that complies with industry standards, and it must provide adequate training to CLECs in the use of that interface, as well as access to personnel who are knowledgeable about the EDI process and interfaces and who can timely respond to issues and problems as they arise. BellSouth has not done that to date. Consequently, LCI has not been able to obtain access to BellSouth's OSS that is equal to that which BellSouth provides to its own retail operations.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief. Executed this 17<sup>th</sup> day of October 1997 in Dublin, Ohio.

  
Albert D. Witbrodt



## **EXHIBIT A**





August 7, 1997

Jimmy Patrick  
BellSouth Interconnection Services  
3535 Colonnade Parkway  
Birmingham, AL 35243

VIA FAX: (205) 977-0037

Re: Unsatisfactory EDI Test Progress

Dear Jimmy:

It has been reported to me by our BST EDI Account Manager, Al Witbrodt, that our EDI test progress to date with BellSouth has been unsatisfactory. Specifically he has addressed the problems outlined below. I'm requesting that you review the issues he has set forth and let us know what actions BellSouth will take in correcting these deficiencies.

- The initial EDI system test began 7/23/97 using the test data published in the 1997 LEO Guide. The initial two test cases should have resulted in receipt of an FOC and Completion Notice within 24 hours. Instead, these test cases contained data anomalies that resulted in rejections and resubmissions.
- As of 8/7/97, four test sets have been sent. There have been no EDI (855) acknowledgements sent back to LCI.
- On 8/6/97, a test case was transmitted, but we have yet to receive acknowledgment of the submission. We were unable to reach our new test coordinator at anytime during the day and have yet to hear from BellSouth.
- During the test period we lost complete contact with BellSouth for three days (July 31, Aug 1, Aug 4) due to an unannounced and unexpected change in BellSouth's test coordinator. Another day was lost (Aug 5) getting up to speed on the test status with BellSouth's EDI specialist. The new test coordinator is on vacation and has yet to contact us.

In order for LCI to complete these initial EDI tests and obtain certification, it is very important that we receive better communication and better response times from BellSouth. We anticipate that timely response and communication from BellSouth will be increasingly vital as we move into more complex testing scenarios.

Thank you for your time and attention towards this matter.

Sincerely,

Betty Batter  
LCI International

cc: Al Witbrodt